

Exhibit A

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsflp.com
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 1401 New York Ave, NW
 Washington, DC 20005
 Tel.: (202) 237-2727
 Fax: (202) 237-6131
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonn@susmangodfrey.com

Attorneys for Plaintiffs

Bill Carmody (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander P. Frawley
 (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
 Michael F. Ram (admitted *pro hac vice*)
 Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 rmcgee@forthepeople.com
 mram@forthepeople.com
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' MOTION TO COMPEL**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' motion to compel Google to search the files of Micha Segeritz, Suneeti Vakharia, and Emil Ochotta, produce responsive documents, and negotiate parameters for their depositions in good faith, if warranted by the documents produced (the "Motion"). Plaintiffs' Motion is **GRANTED**.

In light of deposition testimony from Google's employees and former employees, Plaintiffs have good reason to believe that Mr. Segeritz and Ms. Vakharia worked on a revenue analysis of the Web & App Activity ("WAA") setting at issue in this case, even if that analysis was not carried through to completion. Plaintiffs are not required to trust Google's counsel's assurances that no such study was ever attempted or completed. Google must search the files belonging to Mr. Segeritz and Ms. Vakharia using the string, *(WAA* OR "(s)WAA*" OR sWAA*) AND (revenue* OR profit*)*, provide hit counts for those searches, and produce any responsive documents within that set. If such revenue studies or analyses exist, then the benefit of production will outweigh the burden of Google's search. And if such revenue studies or analyses do not exist, then the burden on Google is unlikely to be significant.

Google must also search the files of Emil Ochotta using the string, *(WAA* OR "(s)WAA*" OR sWAA*) AND Firebase*, and produce responsive documents. Plaintiffs reasonably seek information regarding the consideration that Google paid to the WAA and sWAA settings when it launched Firebase. The witnesses that Google identified have proven to be uninformed about this topic, and even about the privacy controls at the heart of this case. The benefit of this search outweighs its burden.

Finally, to the extent the resulting productions warrant depositions of these individuals, Google must negotiate parameters of those depositions in good faith. This Court will be amenable to resolving any disputes regarding those depositions should they arise in the future.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge